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Attorney for Plaintiffs
JAMES MCGIBNEY
VIAVIEW, INC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JAMES MCGIBNEY, an individual, and
VIAVIEW, INC, a corporation,

Plaintiffs,

vs.

THOMAS RETZLAFF, an individual,
NEAL RAUHAUSER, an individual,
LANE LIPTON, an individual, and
DOES 1-5, individuals whose true names are not
known,

Defendants.

Case No.: 5:14-cv-01059 BLF

**DECLARATION OF BRITTANY RETZLAFF
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT THOMAS
RETZLAFF'S MOTION TO SEAL
EVIDENCE.**

I, BRITTANY RETZLAFF, declare the following under penalty of perjury:

1. I am the daughter of Defendant Thomas Retzlaff, I currently live in Peru.
2. Mr. Retzlaff is my father, he currently resides in Phoenix, Arizona.
3. I have been volunteering my time for the past year, working with James McGibney, who is the founder of Bullyville.com.
4. I have reviewed the motion submitted to this court by Thomas Retzlaff with respect to the evidence as it pertains to myself and the "naked images" that ViaView submitted as Exhibit 3 "Verified IP Report".

- 1 5. I have reviewed the "naked images" and Bullyville/ViaView went out of their way to ensure that any
2 explicit body parts were completely blurred out. I do not want these images to be sealed, nor the
3 comments that accompanied those images.
- 4 6. The public is entitled to see just how horrific of a human being my father is. They should be aware
5 that he posted naked images of me all over the web. They should be aware that he illegally obtained
6 those images while secretly taking photos of me from a hidden camera within his apartment.
- 7 7. I want the public to know that my father, Thomas Retzlaff, made comments about me, his own
8 daughter, which included, but are not limited to, "I wanna rape her, Imma break her teeth out with
9 my dick and rape that booty". "I want to cum all over this whore's face! She looks like a good little
10 whore" and "I would like to suck on her tits while raping her mouth".
- 11 8. Thomas Retzlaff has managed to intimidate my brother and mother to the point that they have turned
12 their backs on me and are now allegedly supporting him. I'm very disappointed in them, however I
13 refuse to let Thomas intimidate me any longer and I most certainly won't be forced into committing
14 perjury. They are claiming that James McGibney is "a liar" and that he has unfairly accused my
15 father of these unimaginable acts. Let this affidavit and my commitment to testifying on behalf of the
16 Plaintiff in this case show, everything that Thomas Retzlaff has been accused of is unequivocally
17 true. He is a convicted felon, he is a vexatious litigant, he did rape my mother and recorded the entire
18 incident, he is a serial stalker and most importantly, he is a pedophile. And as one of his many
19 victims, I refuse to let him silence me through intimidation as he's done to so many other women.
- 20 9. Thomas Retzlaff does not speak nor act on my behalf. As a matter of fact, my father lost any parental
21 rights he had over me a long time ago, via the judicial system in Texas. I ask this court to allow the
22 victim's voice to be louder than the perpetrator and that the images of myself or any of the harassing
23 and threatening emails that Thomas Retzlaff sent to myself be kept public. Those emails were not
24 "family communications" since I never responded to any of the emails sent to me by Thomas
25 Retzlaff from retzlaff@texas.net or dean714@vandex.com. Every email was simply forwarded to the
26 FBI, along with numerous law enforcement agencies, the District Attorney's office and James
27 McGibney from Bullyville.
- 28 10. I have had a TRO and permanent restraining order in place against Thomas Retzlaff since March of
this year. He has violated those restraining orders over 100 times. The time has come for Thomas to
be held accountable for his despicable and unforgiveable actions.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct to the best of my knowledge. Executed in Lima Peru
3 on this 27th day of October 2014.

4 Brittany Retzlaff
5 Brittany Retzlaff
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